

8 August 1957

MEMORANDUM FOR THE RECORD

SUBJECT: Comments on Proposed Regulation No. [] Conflicts of Interest

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1. It is recommended that paragraph 6 of the proposed regulation be restated as follows:

6. REPORTS

Operating Officials and designated officials within the immediate offices of the Director and the Deputy Directors shall report immediately to the Inspector General and the General Counsel any situation in which:

- (1) An employee or former employee appears to be representing a private interest with respect to a matter in which confidence has been reposed in him as an employee, or
- (2) An employee appears to be violating any other provision of this regulation.

Supervisors are responsible for reporting the above situations to their Operating Officials.

2. Restating paragraph 6 in this manner will eliminate the need for Deputy Directors and Operating Officials to issue directives on this reporting requirement. It will also place a responsibility at the supervisory level, where, in actuality, implementation of this regulation will take place.

3. The suggested restatement of paragraph 6 also deletes the requirement for a semi-annual negative report. It is felt that three precedent cases justify this:

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- b. Regulations No. [] require reports only upon receipt of a foreign award or decoration, or the receipt of a gift.

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- c. Formerly, the Controller submitted to the Post Office Department quarterly certificates of compliance with the Penalty Mail Act, simply on the basis of not receiving reports of violations.

[redacted]
Chief, Records Management Staff

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